

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

SALZGITTER MANNESMANN)
INTERNATIONAL (USA) INC.,)
)
)
Plaintiff,)
)
v.) Civil Action No.: 2:07cv764-MHT
)
)
SOUTHEASTERN STUD &)
COMPONENTS, INC.,)
)
)
Defendant.)

**PLAINTIFF'S OBJECTIONS TO DEFENDANT'S
WITNESS AND EXHIBIT LISTS**

Pursuant to the Court's Scheduling Order (Doc. 13), Plaintiff Salzgitter Mannesmann International (USA) Inc. (Salzgitter) submits its objections to the Witness List and Exhibit List filed by Defendant Southeastern Stud & Components, Inc. (Southeastern Stud) on May 15, 2008 (Doc. 43 and 44). Counsel for Salzgitter has spoken with counsel for Southeastern Stud in attempting to resolve these issues, but has been advised that Southeastern Stud is unable to address Salzgitter's objections prior to the Court's deadline of this date.

Salzgitter's objections are as follows:

(1) **No “Will Call”/”May Call” Designation:** Southeastern Stud’s Witness List (Doc. 44) fails to identify its prospective witnesses as “will call” or “may call,” as required by the Court’s Scheduling Order (Doc. 13).

(2) **Unidentifiable Document:** Southeastern Stud’s Exhibit List (Doc. 43) refers to a “spreadsheet of performance,” designated as Exhibit 6, without further identification. Salzgitter is not familiar with this document and cannot identify it based on its cursory description.

(3) **Overly Broad Categories:** Southeastern Stud’s Exhibit List, Exhibits 7 and 8, refer categorically to “emails” and “correspondence.” These descriptions are insufficient to identify the documents that Southeastern Stud plans to offer into evidence at trial.

Respectfully submitted this 9th day of June, 2008.

s/ J. Forrest Hinton
 J. FORREST HINTON
 STACEY A. DAVIS
 J. ELLIOTT WALTHALL

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 Mannesmann International (USA) Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on this June 9, 2008, the foregoing was served by electronic mail via the Court's CM/ECF system on the following:

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s/ J. Forrest Hinton
Of Counsel